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July 14, 2020

**By CM/ECF**

The Chambers of the Honorable Judge Sanket J. Bulsara  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Elliott v. Donegan, et al.*, No. 1:18-cv-05680-LDH-SJB

Dear Judge Bulsara,

Pursuant to Your Honor's order dated July 1, 2020 (ECF 65), Defendant Moira Donegan is due to file a letter on July 15, 2020 setting forth her position on discovery. Ms. Donegan hereby respectfully requests an extension of that deadline to July 17, 2020. We have moved expeditiously to collect Ms. Donegan's documents. However, these efforts have been delayed by logistical issues relating to the pandemic. Our vendor is currently processing Ms. Donegan's materials. An extension of two days would allow us to complete that task and undertake a preliminary review—which would, in turn, allow us to educate the parties and the Court regarding the nature and number of documents here at issue. We are also hopeful that this information might facilitate productive conversations between Ms. Donegan and Mr. Elliott respecting the appropriate parameters of limited CDA discovery in light of Judge DeArcy Hall's recent opinion.

I have consulted with Nick Lewis, counsel to Mr. Elliott, who consents to this motion.

Respectfully Submitted,



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Roberta Kaplan  
Kaplan Hecker & Fink LLP

*Counsel for Defendant Moira Donegan*